REMARKS

Claim Status

Claims 1-6 are currently pending, with claims 1 and 6 being the only independent claims. Claim 6 has been amended. The amendment to claim 6 is a minor correction to the claim wording, and is cosmetic in nature. No new matter has been added. Reconsideration of the application is respectfully requested.

Overview of the Office Action

Claims 1-6 stand rejected under 35 U.S.C. §102(e) as anticipated by U.S. Pub. No. 2003/0039237 ("*Forslow*"). Applicants have carefully considered the Examiner's rejection, and the comments provided in support thereof, and respectfully disagree with the Examiner's analysis. For the reasons which follow, it is respectfully submitted that all claims of the present application are patentable over the cited reference.

Summary of Subject Matter Disclosed in the Specification

The following descriptive details are based on the specification. They are provided only for the convenience of the Examiner as part of the discussion presented herein, and are not intended to argue limitations which are unclaimed.

Disclosed are a system and a method of managing on a terminal at least one architecture dedicated to a communications network that remedies the drawbacks associated with conventional systems by reorganizing the structure of the terminal so as to avoid conflicts between connections to a plurality of communications networks (see pg. 4, lines 1-8 of the specification).

Connections to the communications network are set up via a mobile network, wherein the system comprises at least one dedicated architecture manager integrated into the terminal. The data manager is adapted to:

(1) manage independently all of the architectures dedicated to the communications network (see page 9, lines 22-25 of the specification),

(2) process simultaneously the operation of the terminal when connected to a plurality of the communications networks (page 10, line 22 to page 11, line 13),

(3) manage separately simultaneous connections with a plurality of said communications networks (page 11, lines 14-17), and

(4) manage independently a plurality of said communications networks after receiving a non-unique address from each of said networks connected to the terminal (page 11, line 25 to page 12, line 14).

On setting up the connection to a communications network, the at least one dedicated architecture manager can dialogue with the communications network, wherein the at least one dedicated architecture manager designates a different architecture dedicated to the connection to the new communications network. Within the same terminal, the various dedicated architectures, each providing access to a different communications network, can function simultaneously (see page 7, line 30 to page 9, line 10).

Also disclosed is a method of managing on a terminal a set of architectures dedicated to the plurality of communications networks. The terminal includes at least one user interface. Connections to the communications networks are set up via a mobile network. The method includes the steps of: setting up a connection between the terminal and the plurality of communications networks via the mobile network in at least one dedicated architecture manager, receiving at least one address coming from each of the communications networks connected to

the terminal in the dedicated architecture manager of the terminal, and wherein the dedicated architecture manager in the terminal selects a dedicated architecture for each of the communications networks. The method includes the additional steps of: sending the address to the dedicated architecture selected by the dedicated architecture manager, setting parameters of the address at a network interface in the architectures dedicated to the communications networks, accessing at least one dedicated architecture via the user interface of the terminal, setting up and managing separately by means of the dedicated architecture manager at least one simultaneous connection to the plurality of communications networks, processing the independent management of all the architectures dedicated to the communications networks, processing the simultaneous management of a plurality of communications networks connected to the terminal, and independently managing a plurality of the communications networks after receiving a non-unique address from each of the networks connected to the terminal (see pg. 6, lines 35 of the specification).

Patentability of the independent claims over the Prior Art under 35 U.S.C. §102

Forslow discloses a system and method for communication between a mobile station and an external network. *Forslow* (paragraph [0009]; Fig. 2) teaches a mobile communications system that supports both circuit-switched and packet-switched communications and includes a circuit-switched network 35 and a packet-switched network 51.

Forslow teaches (paragraph [0022]) the selection of circuit-switched services for real time data streams (referred to as applications flows) such as, audio and video, or the selection of packet-switched bearers for non-real time applications such as surfing on the worldwide web, file transfer, e-mail, and telnet, all of which require fast channel access and bursty data transfer capability. *Forslow* (paragraph [0024]) teaches that this selection is performed based on a

determination of whether a circuit-switched bearer or a packet-switched bearer is better suited to transport the application flow for a corresponding quality of service (QoS) associated with real-time or non real-time applications. Different packet-switched and circuit-switched services co-exist within the network, but the services are always located in the same network. However, *Forslow* fails to teach the simultaneous management of a plurality of networks that are connected to the same terminal. The *Forslow* technique does not eliminate the possibility of receiving the same address from two different networks which violates the principle of unique addressing disclosed at pg. 9, line 23 to pg. 10 line 21 and pg. 12, line 8 to pg. 13, line 10 of the present specification.

More specifically, *Forslow* fails to teach "at least one dedicated architecture manager integrated into said terminal ... adapted to manage separately simultaneous connections with a plurality of said communications networks, and adapted to manage independently a plurality of said communications networks after receiving a non-unique address from each of said networks connected to the terminal", as recited in independent claim 1. Rather, *Forslow* teaches a system in which a terminal is connected to only one external network at a time and the addresses sent by this communication network are always different, i.e., *Forslow* teaches a single network having a unique address planning methodology.

Forslow (Fig. 1: 20) teaches that the external network can be a LAN. *Forslow* (Fig. 2: 58) teaches that the external network can also comprise an ISP server (see Fig. 10 and/or Fig. 11, step 170). *Forslow* (Fig. 2) discloses only one network (56) that is connected with the disclosed GGSN equipment (54). In contrast, Fig. 2 of the present specification shows that a pair of different GGSN (30, 30') equipments are connected with different networks (40, 41, 42, 50, 51 and 52), with each possessing a set of services A, B... etc. The arrangement of Fig. 2 is necessary in order to permit the "at least one dedicated architecture manager integrated into said

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terminal ... to process simultaneously the operation of said terminal when connected to a plurality of said communications networks ... [and] to manage separately simultaneous connections with a plurality of said communications networks", as recited in independent claim 1. *Forslow* fails to teach these limitations.

Forslow (paragraph [0029], lines 3-6) teaches that an external network entity performs only a single common access procedure for subsequent communications using either the circuit-switched network or the packet-switched network. However, a person having the ordinary level of skill in the art would readily appreciate that the present claimed invention requires the performance of more than one access procedure, since claim 1 recites that the at least one architecture manager in the terminal is "adapted to process simultaneously the operation of said terminal when connected to a plurality of said communication networks". *Forslow* does not teach a system in which this occurs.

Forslow (paragraph [0030], lines 1-2) states, "the common access procedure includes a common authentication procedure for authenticating the identity of the mobile station with the external network entity". *Forslow* (paragraph [0031], lines 3-7) teaches that the common access procedure configures the terminal for communication with the external network for both the circuit-switched and packet-switched networks. *Forslow* (paragraph [0032], lines 36-38) teaches that by permitting individual application flows to individually select the type of transfer mechanism, i.e., either circuit-switched or packet-switched bearer, a higher QoS for different types of applications is provided. In addition, *Forslow* (paragraph [0032], lines 5-7) teaches the use of the common access procedure for all application flows in a session. *Forslow*, however, does not teach "at least one dedicated architecture manager integrated into said terminal ... adapted to manage separately simultaneous connections with a plurality of said communications networks", as recited in independent claim 1.

Forslow (paragraph [0050] to [0051]) only describes a standard activation procedure for GPRS access. These sections of *Forslow* do not teach the claimed "architecture manager ... [which is] adapted to manage separately simultaneous connections with a plurality of said communications networks," as recited in independent claim 1.

Forslow (paragraph [0094] to [0096]) discloses access with one common external network (see paragraph [0094], line 1: 170), with a "single" common access via two independent bearers (in the same network), i.e., one bearer for GPRS packet services and one bearer for GSM circuit services. That is, *Forslow* teaches the use of only one network, with a set of different services based on the indicated type of service. Present claim 1, on the other hand, states the "at least one dedicated architecture manager ... [is] adapted to manage separately simultaneous connections with a plurality of said communications networks, and [is] adapted to manage independently a plurality of said communications networks". Such a configuration is not provided for in the system disclosed in *Forslow* because only one gateway, i.e,. GGSN (54) is provided for connection to the external network. Thus, in the system of *Forslow* there is no way to achieve an effective simultaneous connection of the terminal to a plurality of communications networks. In view of the foregoing, *Forslow* fails to anticipate independent claim 1 and, thus, reconsideration and withdrawal of the rejection under 35 U.S.C. §102 is respectfully requested.

Independent claim 6 is a method claim which recites features corresponding to distinguishing aspects of the invention discussed above in connection with claim 1. Accordingly, claim 6 is also not anticipated by *Forslow*.

Moreover, due to the fundamental above-discussed differences between *Forslow* and independent claims 1 and 6, it is clear that claims 1 and 6 are unobvious over this reference under 35 U.S.C. §103.

Dependent claims

Claims 2-5 are dependent from claim 1. In view of the patentability of independent claim 1, for the reasons presented above, each of dependent claims 2-5 is patentable therewith over the prior art. Moreover, each of these claims includes features which serve to even more clearly distinguish the invention over the applied references.
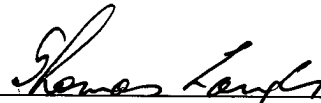
Conclusion

Based on all of the above, it is respectfully submitted that the present application is now in proper condition for allowance. Prompt and favorable action to this effect and early passing of this application to issue are respectfully solicited.

Should the Examiner have any comments, questions, suggestions or objections, the Examiner is respectfully requested to telephone the undersigned in order to facilitate reaching a resolution of any outstanding issues.

Respectfully submitted,

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